

**DAVID G. BANES, Esq.**  
**O'Connor Berman Dotts & Banes**  
**Second Floor, Nauru Building**  
**P.O. Box 501969**  
**Saipan, MP 96950**  
**Telephone No. (670) 234-5684**  
**Facsimile No. (670) 234-5683**

**Attorneys for Plaintiffs Moses T. and Qianyan S. Fejeran**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN MARIANA ISLANDS**

<b>MOSES T. FEJERAN and</b>	)	<b>CIVIL ACTION NO. 05-0033</b>
<b>QIANYAN S. FEJERAN,</b>	)	
	)	<b>MOTION TO COMPEL</b>
<b>Plaintiffs,</b>	)	
	)	<b>Date: March 15, 2007</b>
<b>vs.</b>	)	<b>Time: 1:30 p.m.</b>
	)	
<b>AVIATION SERVICES (CNMI), LTD.</b>	)	<b>Judge: Munson</b>
<b>d.b.a. FREEDOM AIR,</b>	)	
	)	
<b>Defendant.</b>	)	

Plaintiffs, by and through counsel, and after an attempt to meet and confer with opposing counsel to resolve this dispute, hereby move this Honorable Court for an Order compelling Defendant to answer certain interrogatories and respond to certain requests for production of document. Defendant has filed a Motion to Strike and relies, improperly, on this pending Motion to justify its failure to respond to Plaintiffs' legitimate discovery requests. This Motion is supported by its Memorandum In Support, all other papers on file with this Court and whatever argument is adduced at the hearing of this Motion.

Furthermore, Plaintiff requests that the costs and attorney fees associated with bringing this Motion be taxed against the Defendant.

1 Dated: February 15, 2007.

2 O'CONNOR BERMAN DOTTS & BANES  
3 Attorney for Plaintiffs Moses T. and  
4 Qianyan S. Fejeran

5 By: \_\_\_\_\_/s/\_\_\_\_\_  
6 DAVID G. BANES.